

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

Crypto Infiniti, LLC,

Plaintiff,

v.

Blockquarry Corp. f/k/a ISW Holdings, Inc.,
and Pantheon Resources, Inc.,

Defendants.

C/A No. _____

**PLAINTIFF'S RESPONSES TO
LOCAL RULE 26.01
INTERROGATORIES**

The Plaintiff Crypto Infiniti, LLC, by and through its undersigned counsel, hereby responds to Local Rule 26.01 Interrogatories as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.

ANSWER: None.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: The Plaintiff requests a jury trial. The Plaintiff has made legal claims against Defendants and is entitled to a jury trial on those claims. The Plaintiff has made a single equitable claim, and that claim should be tried to the Court or by an advisory jury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly owned company of which it is a parent; and (3) each publicly owned company in which the party owns ten percent (10%) or more of the outstanding shares.

ANSWER: The Plaintiff is not a publicly owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civ. Rule 3.01 (D.S.C.).

ANSWER: The claims made address the actionable conduct of Defendants that occurred primarily in the Gaffney, South Carolina area.

(E) Is this action related in whole or in part to any other matter filed in this district, whether civil or criminal? If so, provide (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases that may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the clerk of court based on a determination of whether the cases arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER:

(A) Yes. (1) This action is related to *Blockquarry Corp. v. Litchain Corp., et al.*, C/A No. 7:23-cv-01427-TMC. (2) This action addresses a settlement agreement in that case. Plaintiff alleges it has standing to sue on that contract as a third-party beneficiary because Defendant has not been complied with the contract. (3) That case is closed.

(B) Yes. (1) This action is related to *BEEQB, LLC v. Blockquarry Corp., et al.*, C/A No. 7:24-cv-03179-TMC. (2) This action alleges the same type of actionable conduct that is alleged in that case, namely the unlawful possession of Plaintiff's bitcoin mining equipment and property, and this action includes the same Defendants. (3) That case is pending.

(H) Parties or Intervenors in a Diversity Case. In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders

otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

ANSWER: The Plaintiff is a Nevada limited liability company with its principal place of business located in Reno, Nevada. No member of the company is a South Carolina resident or citizen. The Plaintiff has two members. One member is Jinwei Zhang, and she is a citizen and resident of Nevada. The other member is a company incorporated in the Cayman Islands and named Dao Block Limited. The owners of Dao Block Limited are not residents or citizens of South Carolina.

Respectfully submitted,

/s/Burl F. Williams

Burl F. Williams (FED. BAR NO. 10556)

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Greenville, South Carolina